#### **REMARKS**

# I. Status of the Claims

Claims 1 - 6, 8 - 13 and 15 stand rejected. Claims 7 and 14 are objected to.

## II. Claim Objections

Claims 7, 10 and 14 were identified by the Examiner as having informalities concerning dependencies. The claims have been amended for the sole reason of correcting the dependencies.

# III. Rejections Under 35 U.S.C. §102

#### A) The Henze Reference

The Office Action identified rejections to claims 1-4, 6, 8-11, 13 and 15 under 35 U.S.C. 102 as being anticipated by Henze (U.S. Patent No. 4,924,170).

Henze discloses (as illustrated in Figure 5) a power supply configuration that includes an unregulated DC supply 20 that feeds its output to a parallel array of power supply modules PSM1 through PSMN to drive a load 28. One of the power supply modules, PSM1, is illustrated in detail (denoted inside the phantom boundary), and includes the control circuitry identified by the examiner (identified with reference numerals 24, 26, 50, 66 and 70). Of importance is the statement made in column 4, lines 40 - 43 wherein:

"It should be noted that the circuitry of the first power module PSM1, the second power module PSM2, and further power modules PSMN, are substantially identical to each other ..."

In other words, the control circuitry of Henze (features identified by 24, 26, 50, 66 and 70) is duplicated in each power supply module, or output stage.

It is well known that anticipation under 35 U.S.C. §102 requires that each and every element as set forth in the claim is found, either expressly or inherently described,

in a single prior art reference. <u>In re Robertson</u>, 169 F.3d 743, 49 U.S.P.Q.2d 1949 (Fed. Cir. 1999)(reversing Board of Patent Appeals & Interference's finding of anticipation under §102).

## 1) Claims 1 and 8

Claims 1 and 8 both recite in part "a control module having a control signal output line ... and a plurality of output modules having respective control inputs coupled in parallel to the control signal output line to receive the control signal ..."

In contrast to Henze's conventional scheme that employs control circuitry in each of the output modules, the invention of claim 1 provides a single control module to supply the control signals for any number of output stages. This enables the plurality of output stages to be free of the potential performance and headroom problems often associated with conventional power supplies, such as Henze, that have control circuitry implemented in each output module.

For this reason, claims 1 and 8 are believed patentable over Henze, and reconsideration is respectfully requested.

# 2) Claims 2 - 4, 6, 9 - 11, and 13

These claims depend directly or indirectly from claims 1 and 8, and are believed patentable over Henze for the same reasons discussed above.

### 3) Claim 15

Claim 15 includes language similar to claims 1 and 8, reciting in part "selecting a control module comprising control circuitry for generating respective sink and source control signals... and paralleling a plurality of output current modules to receive the sink and source control signals ..." In other words, the method takes a single control module, generates control signals, and distributes the control signals to a parallel array of output modules. As noted above with respect to claims 1 and 8, this basic scheme distinguishes over Henze. Reconsideration is requested.

# B) The Wyman Reference

The Office Action identified rejections to claims 1, 3 - 6, 8, 10 - 12, and 15 under 35 U.S.C. 102 as being anticipated by Wyman et al. (U.S. Patent No. 4,035,715).

Wyman discloses a power supply having output modules comprising voltage sources with low output impedances.

### 1) Claims 1 and 8

Claims 1 and 8 both claim "a plurality of output modules ... having respective current outputs connected in parallel ..." In other words, the output modules are current sources with high output impedances. Consequently, slight variations in the output impedance have very little effect on the output current.

In contrast, Wyman describes using voltage sources with low output impedances. This construction is often susceptible to undesirable output swings due to small variations in the output impedance. For this reason, claims 1 and 8 are believed patentable over Wyman. Reconsideration is respectfully requested.

### 2) Claims 3 - 6 and 10 - 12

Claims 3 - 6 and 10 - 12 depend directly and indirectly from claims 1 and 8 are believed allowable for the same reasons explained above.

#### 3) Claim 15

Claim 15 recites the step of "paralleling a plurality of output current modules ...". The current module feature distinguishes over Wyman as exlplained above regarding claims 1 and 8. Thus, claim 15 is believed allowable over Wyman.

## IV. Allowable Subject Matter

The Applicants graciously acknowledge the Examiners courteous indication that claims 7 and 14 would be allowable subject to the correction of dependencies noted above. Claims 7, 10 and 14 have been amended to correct the dependencies.

Applicants submit that all of the amendments and remarks set forth above place the claims in condition for allowance, and early notice thereof is respectfully solicited. Please charge a two-month extension fee of \$410 to Deposit Account No. 20-0515.

Respectfully Submitted

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